Feedback Form

Repowering Existing Facilities – October 20, 2025

Feedback Provided by:

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Date: Nov 21, 2025

To promote transparency, feedback submitted will be posted on the Long Lead-Time engagement page unless otherwise requested by the sender.

- ☐ **Yes – there is confidential information, do not post**
- x **No – comfortable to publish to the IESO web page**

Following the Repowering Existing Facilities engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the LLT RFP Stakeholder Engagement Webpage.

Note: The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials please indicate if they are confidential.

Please submit feedback to engagement@ieso.ca **by November 21, 2025 .**

General Comments/Feedback

Brookfield Renewable appreciates the opportunity to provide comments.

Procurement streams and conditions

We recommend that the IESO consider three general categories when procuring power from existing facilities.

First, the Mid-Term RFPs should be the procurement venue to **extend the life** of existing facilities. In other words, existing facilities that can still operate reliably with routine maintenance, and whose owners are not ready to consider repowering, would compete in the Mid-Term RFPs. For certain facilities, repowering may not be a ready option due to supply chain constraints, technical challenges, capital allocation considerations, the company's priority being elsewhere, or other business factors. In other cases, facility owners can simply prefer the life extension option as the most economical way to continue providing power to the grid. In both scenarios, the owners hold technical and business information that are unique to their facility and company, and they are best placed to decide how to sustain their assets' life. As such, we recommend that the IESO continue to hold regular and predictable Mid-Term RFPs (e.g., every 1.5 to 2 years) for such facilities to extend their lives and/or to bridge into a future repowering RFP.

Importantly, we recommend that the IESO keep the same financially focused RFP design as seen in the Mid-Term 2 RFP. In this context, proponents are only required to maintain their existing permits as the condition to participate, and bids are only evaluated on a financial basis. Participants of Mid-Term RFPs are existing facilities with established regulatory records and verifiable performance in the IESO-administered market. As such, increasing their regulatory and administrative burden to participate in future Mid-Term RFPs would only increase offer prices and detract from their owners' focus on repowering and/or greenfield projects.

In sum, holding regular Mid-Term RFPs (with the same design as the Mid-Term 2 RFP) would help owners extend the life of their facilities and bridge into future repowering projects. This approach also has the benefit of not requiring additional consultations as: a) the sector is already familiar with the Mid-Term 2 RFP's design, and b) the Mid-Term 2 RFP produced a successful outcome.

Second, facilities that are ready to **fully repower** should compete directly with greenfield projects and be evaluated under the same qualifying rules. Also, fully repowered and greenfield projects should be granted the same contract length (i.e., 20+years). To be clear, fully repowering should be defined as the complete replacement of a facility's turbine technology, including foundation. While fully repowering facilities may benefit from existing infrastructure and relationships with local communities, the work required to remove turbines and foundations, not to mention the associated downtime and revenue loss, could be more challenging and costly than building from scratch.

In addition, whether a project can be considered as "fully" repowered or not should be clearly laid out and in accordance with a "checklist" of replaced components.

To reiterate, a fully repowering project should be evaluated under the same criteria as greenfield projects, as they would both require significant engineering work and investment to complete. Partial repowering projects, on the other hand, could see important variation in the level of engineering work and therefore financial investment required.

Finally, facilities that are able to **partially repower** should compete in their own procurement stream and be required to undergo a full third-party certification to participate in the RFPs. We recommend carving out partial repowering projects because each existing facility is unique, and even facilities of the same vintage can be in drastically different conditions. These variations can be due to their operational history, geography and wind regime, equipment selection decisions, and maintenance practices. Moreover, facility owners would need to rely on studies from manufacturers and independent engineers to fully understand what components can or cannot be replaced to secure another 20+year contract. Given this uncertainty, offers from partial repowering projects may present the lowest cost options, but their ability to perform during the awarded contract life should be confirmed by third-party professionals. In an undesirable scenario, an overly optimistic and lower-priced bid could minimally replace its components and be awarded a 20+ year contract that it cannot achieve. As a result, this optimistic bid could displace higher-priced bids that accurately determined what needs to be replaced to fulfill another long-term contract. To be clear, the consideration that partially repowering bids may be lower-cost but riskier is why we recommend carving out partially repowering projects in their own procurement stream.

Brookfield Renewable has extensive experience repowering our existing facilities. We are confident of our ability to prepare repowering bids, and to deliver safe and reliable power for a renewed long-term contract. However, the repowering of existing facilities is a new venture in Ontario, and we recommend that the IESO take a cautious approach to ensure that partial repowering projects can successfully fulfill their new obligation by requiring a third-party certification as a qualification condition.

In a separate note, we have no knowledge of jurisdictions imposing higher PPA performance penalties for partial repowering projects to mitigate this risk.

Bidding flexibility

We recommend that the IESO take a flexible approach with regards to accepting bids from the same facility or from adjacent facilities with the same owner.

As mentioned previously, the decision to life-extend, partially repower, or fully repower a facility, is a complex one. There are technical, financial, and organizational factors at play that are unique to individual facilities. The IESO should maintain its current practice of allowing Mid-Term RFP contracts to be cancelled without penalty if the associated facility successfully receives a Long-Term

RFP contract. In this context, the flexibility to obtain a Mid-Term contract first while evaluating other longer-term options would help owners design the best technical and economical proposal for the IESO.

In addition, the IESO should allow facilities that are separately contracted but located physically adjacent to each other to be combined as a single offer. In this scenario, two existing facilities (with the same technology type and same owner) might share the same infrastructure, but were contracted and constructed at different times in response to different RFPs. The IESO should allow these adjacent facilities to be combined and offered as one single project so that they can be stakeholdered, permitted, evaluated, and constructed together. This flexible approach would allow their owner to apply economies-of-scale, streamline permitting and local stakeholdering work (e.g., seek one single municipal council resolution), and as a result greatly reduce project costs and timeline. We believe that this approach would ultimately benefit the RFP outcome, as the combined project would likely be more cost-effective. In addition, such projects would be aligned in their construction timeline, which would benefit the IESO's system planning.

Importantly, the combined project would share the same permits, stakeholdering requirements, and other qualification criteria. As such, the IESO would only need to evaluate one single project in the RFP, as opposed to two offers with two sets of requirements to verify.

Finally, we note that these jointly offered facilities' in-service dates should be allowed to be staggered, so as to minimize construction downtime and production loss during construction. For example, Facility X and Facility Y are adjacent facilities with the same owner and share much of the infrastructure, but Facility X's existing contract ends in 2030 while Facility Y's contract ends in 2032. At our suggestion, their proponent should be allowed to bid Facility X and Facility Y as a bundle**.**

Alternatives to Repowering

Facilities that cannot operate safely and with a path towards successful commercialization will be decommissioned.